

Act of 1964 (Title VII, 42 U.S.C. § 2000e *et seq.*), Civil Rights Act of 1866 (Section 1981, 42 U.S.C. § 1981), and Age Discrimination in Employment Act of 1967 (ADEA, 29 U.S.C. § 621 *et seq.*

4. Removal is proper because these claims arise under federal law and are ones in which the U.S. District Court has original jurisdiction.

5. The U.S. District Court for the Western District of Missouri is the appropriate court for filing of a notice of removal from the Circuit Court of Jackson County, Missouri where the action was commenced and is pending.

6. Accordingly, City seeks to remove this action to the U.S. District Court for the Western District of Missouri.

7. Thirty days have not expired since Defendant was served with a copy of the summons and petition.

8. Immediately upon filing this notice of removal, Defendant will file a copy of this notice with the clerk of the Circuit Court of Jackson County, Missouri and provide written notice to Plaintiff.

9. Copies of all process, pleadings, and orders served upon the City in the action are attached. (Exhibit A)

10. The City reserves the right to amend or supplement this Notice of Removal.

11. Removing this action to federal court does not indicate an admission of any of the averments or allegations made by Plaintiff, nor does it waive the right to assert any and all defenses.

WHEREFORE, Defendant City of Kansas City, Missouri, gives notice of the removal of this action from the Circuit Court of Jackson County, Missouri to this Court.

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY

By: /s/ Bret Kassen

Bret R. Kassen, #58967

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**ATTORNEYS FOR DEFENDANT CITY
OF KANSAS CITY, MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2019, I electronically filed the foregoing Notice of Removal with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification to all CM/ECF participants of record in this case. Service of this Notice of Removal was also made by U.S. mail, postage prepaid, to Plaintiff's attorney Gerald Gray II at:

Gerald Gray II
G. Gray Law, LLC
104 W. 9th Street
Suite 401
Kansas City, Missouri 64105

/s/ Bret Kassen

Attorney for Defendant

